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Counsel for Defendant, JP Morgan Chase Bank, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MA OLIVIA ABAD,

Plaintiff,

v.

**EQUIFAX INFORMATION SERVICES LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; JPMORGAN CHASE BANK, N.A.;
CITIBANK, N.A.; SYNCHRONY FINANCIAL;
CAPITAL ONE BAN, NATIONAL
ASSOCIATION; BANK OF AMERICA
CORPORATION; AMERICAN EXPRESS,
INC.; and DISCOVER BANK,**

Defendants.

CASE NO. 2:25-cv-00090-CDS-DJA
JOINT MOTION
~~STIPULATION~~ **AND PROPOSED**
ORDER TO EXTEND TIME TO
RESPOND TO THE COMPLAINT
(FIRST REQUEST)

Plaintiff, Ma Olivia Abad and Defendant, JP Morgan Chase Bank, N.A. (“Chase”), by and through their respective counsel, stipulate and agree to an extension of time for Chase to respond to the Complaint. The parties continue to discuss a potential resolution to this case but require additional time to pursue those discussions. Accordingly, pursuant to LR IA 6-2, it is hereby stipulated and agreed to by counsel that Chase’s time to respond to the Complaint is extended from

...

...

February 12, 2025, to **March 14, 2025**. This stipulation is filed in good faith and not intended to cause delay.

IT IS SO STIPULATED.

DATED this 11th day of February 2025

FREEDOM LAW FIRM, LLC

/s/ Gerardo Avalos

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Attorneys for Plaintiff Ma Olivia Abad

DATED this 11th day of February 2025

GREENBERG TRAURIG, LLP

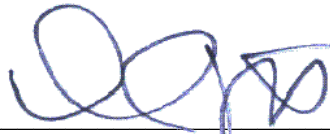
/s/ Alix R. Goldstein

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***Counsel for Defendant, JP Morgan
Chase Bank, N.A.***

ORDER

Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the joint motion (ECF No. 15).

DATED: 2/12/2025



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **February 11, 2025**, I caused the foregoing **STIPULATION AND ORDER** to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi